

# **EXHIBIT 2**

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14 UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,  
19 Plaintiff,  
20 v.  
21 UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
22 Defendants.  
23

Case No. 3:17-cv-00939-WHA

**DEFENDANT UBER  
TECHNOLOGIES, INC. AND  
OTTOMOTTO LLC'S SEVENTH  
SET OF INTERROGATORIES  
(NO. 28)**

Trial Date: October 10, 2017

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1                   Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Defendants Uber  
 2 Technologies, Inc. and Ottomotto LLC (“Defendants”) hereby request that Plaintiff Waymo LLC  
 3 (“Waymo”) respond to Uber’s Fifth Set of Interrogatories (the “Interrogatories”). Defendants  
 4 request that Waymo answer each interrogatory below and serve its answers on Defendants’  
 5 counsel at the offices of Morrison & Foerster LLP, 425 Market Street, San Francisco, CA 94105-  
 6 2482, within thirty (30) days, or such other time as the parties agree or the Court orders.

7                   **DEFINITIONS**

8                   The words and phrases used in these Interrogatories shall have the meanings ascribed to  
 9 them under the Federal Rules of Civil Procedure and the Local Rules of the United States District  
 10 Court for the Northern District of California. In addition, the following terms shall have the  
 11 meanings set forth below whenever used in any interrogatory.

12                  The following definitions apply to the instructions and interrogatories below, regardless of  
 13 whether upper or lower case letters are used for the defined terms, and are incorporated into each  
 14 instruction and interrogatory as if fully set forth therein:

15                  1.        “Action” and “this Action” shall mean *Waymo LLC vs. Uber Technologies, Inc.,*  
 16 *Ottomotto LLC, and Otto Trucking LLC*, Case No. 3:17-cv-00939-WHA, pending in the United  
 17 States District Court for the Northern District of California.

18                  2.        “Waymo,” “Plaintiff,” “You,” and “Your” shall mean collectively and  
 19 individually: Waymo LLC (previously Project Chauffeur), Google Inc., and Alphabet Inc.; their  
 20 parents, predecessors, successors, assigns, affiliates, direct and indirect subsidiaries, and partners;  
 21 any joint venture in which Waymo LLC, Google Inc., and/or Alphabet Inc. hold an interest;  
 22 persons owned or controlled by the foregoing in whole or in part; and their officers, directors,  
 23 employees, agents, representatives, accountants, financial advisors, consultants, and attorneys.

24                  3.        “Uber” shall mean Uber Technologies, Inc., and any predecessor or successor  
 25 entities, any parents, subsidiaries, or affiliates, and any joint ventures in which Uber  
 26 Technologies, Inc. holds an interest; persons owned or controlled by the foregoing in whole or in  
 27 part; and their officers, directors, employees, agents, representatives, accountants, financial  
 28 advisors, consultants, and attorneys.

1           4.     “Otto” shall mean Ottomotto LLC and any predecessor or successor entities, any  
2 parents, subsidiaries, or affiliates, and any joint ventures in which Ottomotto LLC holds an  
3 interest; persons owned or controlled by the foregoing in whole or in part; and their officers,  
4 directors, employees, agents, representatives, accountants, financial advisors, consultants, and  
5 attorneys.

## **INSTRUCTIONS**

7       1. You must respond to these interrogatories in accordance and compliance with the  
8 Federal Rules, the Local Rules, any relevant order entered in this Action, and the Default  
9 Standard for Discovery in this judicial district or other superseding agreements between the  
10 parties related to discovery.

11        2.     In accordance with the applicable Federal Rules, the interrogatories below seek all  
12 responsive information in Your possession, custody, or control. If You cannot fully respond to  
13 the following interrogatories after exercising due diligence to secure the information requested  
14 thereby, so state, and specify the portion of each interrogatory that cannot be responded to fully  
15 and completely. In the latter event, state what efforts were made to obtain the requested  
16 information and the facts relied upon that support the contention that the interrogatory cannot be  
17 answered fully and completely; and state what knowledge, information or belief You have  
18 concerning the unanswered portion of any such interrogatory.

19       3.     If You object to any interrogatories or any part of an interrogatory, identify the  
20     part to which You object, state the objection(s) with specificity, and provide a response to the  
21     remaining unobjectionable part.

22        4. If You object to all or any part of an interrogatory, the objection must state  
23 whether any responsive information is being withheld on the basis of that objection.

24       5.     If You withhold any information based on a claim of privilege, immunity, or  
25 protection from disclosure, You must provide a statement of the claim in accordance with Rule  
26 26(b)(5) of the Federal Rules, and as required by Provision 1(d) of the Default Standard for  
27 Discovery in this judicial district or as otherwise agreed by the parties. Such statement should  
28 explain and substantiate the claim so as to permit adjudication of the claim's propriety.

1       6.     If Your response to a particular interrogatory is a statement that You lack the  
2     ability to comply with that interrogatory, You shall specify whether the inability to comply is  
3     because the particular item or category of information never existed, has been destroyed, has been  
4     lost, misplaced or stolen, or has never been, or is no longer in Your possession, custody or  
5     control, in which case You shall identify the name and address of any person or entity known or  
6     believed by You to have possession, custody or control of that information or category of  
7     information.

8       7. The interrogatories, definitions, and instructions herein are propounded for the  
9 purpose of discovery and are not to be taken as a waiver of or prejudice to any objections that  
10 may be made at any hearing or trial in this Action to the introduction of any evidence relating to  
11 information responsive to these interrogatories or as an admission of the authenticity, relevance,  
12 or materiality of information and/or Documents responsive to these interrogatories.

13        8.        These interrogatories shall be deemed to be continuing in accordance with  
14 Rule 26(e) of the Federal Rules, so that You are required to supplement Your response if You  
15 come into the possession, custody, or control of additional responsive information between the  
16 time of initial responses and the time of trial.

## INTERROGATORIES

**INTERROGATORY NO. 28:**

1 Dated: July 19, 2017

MORRISON & FOERSTER LLP

2 By: /s/ Arturo J. González  
3 ARTURO J. GONZÁLEZ

4 Attorneys for Defendant  
5 UBER TECHNOLOGIES, INC.

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